

EXHIBIT A



BRANCH LAW FIRM®
ATTORNEYS AND COUNSELORS AT LAW

Margaret Moses Branch

Partner

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PRACTICE AREAS

- **Toxic Tort**
- **Natural Gas**
- **Hydrochloric Acid and Pesticides**
- **Environmental Issues**
- **Legal Resolutions**

Margaret Moses Branch is married to Turner W. Branch, senior partner of the Branch Law Firm. Ms. Branch is the managing partner. She is a member of the American Board of Trial Advocates and International Women's Forum, named Woman of the Year in 1995. She serves on the Board of Directors of the New Mexico Trial Lawyers Association, and is currently on the Board of Directors of the Center for Civic Values (Interest on Legal Trust Accounts). She was Chair of the Association of Trial Lawyers Women's Law Caucus (5,000 members), and was founding President of the New Mexico Women's Bar Association. She has been a frequent lecturer on Continuing Legal Education programs for attorneys. Ms. Branch has served as Vice Chair of the Association of Trial Lawyers of the America Tobacco Litigation Group.

In her practice, Margaret Moses Branch has been particularly interested in women's health issues. She has served on the Executive Committee of the Failure to Diagnose Breast Cancer ATLA Litigation Group. She was moderator for the National College of Advocacy, Medical-Legal Update Seminar, for the section entitled "Medicine and the Law: Special Issues Facing Women." Ms. Branch served as a moderator of the ATLA National College of Advocacy, "Litigating Women's Health Issues".

She has served as counsel in cases which involved failure to diagnose breast cancer, colon cancer, uterine cancer, pancreatitis, leukoplakia, peritonitis, appendicitis, compartment syndrome, aneurysms, pneumonia, meningitis, abruptio placenta, kernicterus and other illnesses and diseases. She has been involved in cases that addressed issues of surgical negligence, i.e., laminectomies, cholecystectomies, colonoscopies, hernia repairs and hip replacements. Additionally, she has been involved in cases that dealt with obstetrical issues, i.e., failure to perform timely Caesarean sections, inappropriate radiological procedures, unnecessary hysterectomies and incomplete abortions.

Ms. Branch was appointed to the Plaintiffs' Multi-District Litigation Plaintiffs' Steering Committee which is responsible for representing all women nationwide who filed breast implant cases in the federal court system. She also served as chair of the Mentor Committee which negotiated a 23b(1)(B) limited fund class settlement of *\$25.8 million. Ms. Branch served on the five-member team that negotiated an opt-out Rule 23 class settlement in the amount of *\$4.75 billion. In March of 1994, she was appointed settlement class counsel in the Breast Implant Global Settlement. Ms. Branch was appointed to the Tort Claimants' Committee to protect the interests of Dow Corning claimants and assist in formulating a bankruptcy plan.

Ms. Branch has been very active in mass tort litigation and has represented hundreds of clients in the MDL for cases including, but not limited to the Fen-Phen litigation which may have caused heart valve damage and also worked on and served on the Plaintiff's steering committee for the Baycol litigation, a diabetic drug that may have caused Rhabdomyolysis. Ms. Branch also worked on Rezulin a drug that caused liver damage. Ms. Branch represented a large number of women affected by these toxic products.

Ms. Branch and the Branch Law Firm represented several hundred clients in the Vioxx settlement.

Ms. Branch has also been involved in toxic tort cases involving hydrogen sulfide, natural gas, hydrochloric acid and pesticides; and she is particularly interested in environmental issues and legal resolutions.

Ms. Branch was actively involved in the L-Tryptophan Multi-District Litigation. L-Tryptophan is an amino acid that was marketed as a therapeutic aid for insomnia, premenstrual syndrome and depression. It was a product (primarily used by women) which required no governmental safety testing until the product was associated with Eosinophilia Myalgia Syndrome, an autoimmune disease that causes scleroderma, pulmonary hypertension and brain lesions.

Ms. Branch is also most proud of the work done while serving on the Tobacco Committee that successfully settled the Castano Tobacco litigation as well as assisting in the representation of the New Mexico Attorney General in: State of New Mexico, ex rel Tom Udall, Attorney General of State of New Mexico v. The American Tobacco Company, et al., Santa Fe County District Court (New Mexico) in the successful settlement for the State of New Mexico that forced the Tobacco companies to pay for reimbursement of medical costs to the State.

She has been actively involved in women's health issues, including defective pharmaceuticals and medical devices. She has written articles for the American Trial Lawyers Association, New Mexico Bar Association, New York Bar Journal, Texas Bar Association, New Mexico Trial Lawyers Association and Lawyers Education Institute.

*Past successes cannot be an assurance of future successes because each case must be decided on its own merits.

Margaret Moses Branch

Education

- J.D., University of New Mexico School of Law, Albuquerque, New Mexico, 1978
 - B.S., University of New Mexico, Albuquerque, New Mexico, 1975
- Honors: With Honors

Litigation Percentage

- 100% of Practice Devoted to Litigation

Bar Admissions

- New Mexico, 1978
- Colorado, 2001
- U.S. Court of Appeals 10th Circuit, 1988
- U.S. District Court District of New Mexico, 1978

Classes/Seminars Taught

- Instructor, Preparation and Presentation of Medical Expert Testimony, Texas Trial Lawyers Seminar, Steamboat Springs, Colorado, 1990
- Instructor, University of New Mexico School of Law Trial Practice Session, 1990
- Instructor, Trial Practice Errors, Stetson Law School Trial Practice Class, 1990
- Instructor, 1991 Update on Torts - New Trends in Business Torts, New Mexico Trial Lawyers Association Seminar, 1991
- Instructor, Update in the Areas of Sexual Discrimination and Civil Rights, New Mexico Trial Lawyers Association Seminar
- Instructor, Medicine and the Law: Special Issues Facing Women, Association of Trial Lawyers of America National College of Advocacy, Medical-Legal Update Seminar, 1992
- Instructor, Choosing and Preparing the Economic Expert: Appraiser, Accountant, Economist, Law Education Institute, 1992
- Speaker, Moderator, Litigating Women's Health Issues, Association of Trial Lawyers of America National College of Advocacy, 1992
- Speaker, Essentials of Trial Practice: Medical Malpractice Section, Association of Trial Lawyers of America National College of Advocacy, 1992
- Speaker, Rainmaking: How to Get and Keep Clients, Women Litigators' Forum, 1993
- Speaker, Guinea Pigs Again: Women's Rights in Health Issues: Plastic Surgery, Breast Implants and other Procedures, Association of Trial Lawyers of America National College of Advocacy Annual Convention
- Speaker, Multi-District Litigation and Class Actions, Albuquerque Lawyers' Club, 1993
- Speaker, Breast Implant Litigation, Law Education Institute National Continuing Legal Education Conference, 1993
- Speaker, Strategies and Techniques for Negotiating Cases with Manufacturers, ATLA National College of Advocacy, Pharmaceuticals and Medical Devices Seminar, 1993

- Speaker, Mentor Settlement: Rule 23 Mandatory Settlement: MDL Discovery Progress, Association of Trial Lawyers of America, National College of Advocacy Breast Implant Seminar, 1993
- Speaker, Breast Implant Global Settlement Resolution, Association of Trial Lawyers of America, National College of Advocacy Breast Implant Seminar, 1993
- Speaker, Use of MRIs and Neuropsychology Reports in L-Tryptophan Cases, Association of Trial Lawyers of America Annual Convention, 1993
- Speaker, The High Impact Resume and Impressive Interview Techniques: A Hiring Partner's Perspective, Association of Trial Lawyers of America From Classroom to Courtroom Seminar, 1993
- Co-Chair, Specialized College, Damages, Association of Trial Lawyers of America, National College of Advocacy, 1994
- Invited Speaker, Status of Breast Implant Litigation, Texas and New Mexico State Bar, 1994

Honors and Awards

- Fellow, New Mexico Bar Foundation

Professional Associations and Memberships

- University of New Mexico Graduate Students Association, 1976 - 1977
Vice President
- University of New Mexico Graduate Students Association, 1977 - 1978
President
- New Mexico, 1980 - Present
Real Estate Broker
- National College of Trial Advocacy, University of Washington, 1985
Member
- Hastings College, Advanced College, Products Liability, 1991
Member
- State Bar of New Mexico, Committee on Implementation of the Task Force, 1990 - Present
Recommendations on Women in the Legal Profession, Member
- Second Judicial District, 1991 - Present
Member, Judicial Selection Committee
- Association of Trial Lawyers of America, 1992
Exec. Committee, Failure to Diagnose Breast Cancer Litigation Group
- Association of Trial Lawyers of America, 1993 - Present
Vice Chair, Women Trial Lawyers Caucus
- Breast Implant Multi-District Litigation, MDL 926, 1992 - Present
Member
- Plaintiffs' Negotiating Team for Mentor Rule 23 Settlement in MDL 926, 1993
Co-Chair
- Plaintiffs' Negotiating Team for Proposed Breast Implant Global, 1993
Settlement in MDL, Member
- Albuquerque Bar Association
Member

- State Bar of New Mexico, 1982
Vice President, Young Lawyers Division
- New Mexico Womens Bar Association, 1990 - 1991
President
- New Mexico Womens Bar Association, 1990 - Present
Member, Board of Directors
- New Mexico Trial Lawyers Association, 1993
Member, Board of Directors
- Association of Trial Lawyers of America, 1992
Co-Chair, Membership Task Force
- Albuquerque Lawyers Club
Member
- Association of Trial Lawyers of America
Sustaining Member

MDL and Consolidated Litigation Experience

I am very familiar with the manual for Multi-District Litigation and Procedure. My law firm worked on Breast Implant Litigation with the Honorable Samuel Pointer, United States District Judge in Birmingham, Alabama. I was appointed to the Plaintiff's Steering Committee in the Breast Implant Litigation MDL and served on the Settlement Committee. I also served on the Dow Corning Tort Claimant's Committee. The Branch Law Firm co-headed the Discovery Committee for the Baycol Litigation against Bayer Pharmaceutical.

The Branch Law Firm was appointed to the Plaintiff's Steering Committee in the L-Tryptophan MDL Litigation.

The Branch Law Firm was also appointed to the Plaintiff's Steering Committee in the Avandia MDL even though the litigation commenced three years ago.

The Branch Law Firm also had the pleasure and responsibility of serving as Vice-Chair of the Norplant Contraceptive Litigation Plaintiff's Steering Committee docketed in the Eastern District of Texas, in Beaumont, Texas. The Firm therein fulfilled and performed its duties, responsibilities and obligations as such, to completion in that litigation and in all other MDLs upon which the Firm was appointed to the Plaintiff's Steering Committees.

The Firm filed four hundred cases in the Fen-phen MDL Litigation. We actively worked on the Vioxx Litigation and were a part of the trial team in Judge Carol E. Higbee's Court in New Jersey and had eleven (11) cases scheduled for consideration and trial when the National Vioxx Settlement was reached. The Firm was originally appointed as State Liaison Counsel to the MDL by the Honorable Eldon E. Fallon, United States District Court for the District of Louisiana. This New Jersey litigation was coordinated with the MDL Litigation. I was also admitted to practice law in New Jersey by the New Jersey Supreme Court, on Motion, to assist in the preparation and trial of the Vioxx cases.

Margaret Moses Branch

There are numerous other Mass Torts that the Firm has worked on and been appointed to positions of leadership and responsibility in.

Additionally, I was appointed as Special Assistant Attorney General in the Tobacco Litigation on behalf of the State of New Mexico and as Special Assistant Attorney General on behalf of the State of New Mexico in the consolidated Oil and Gas Royalty Litigation.

Margaret Moses Branch